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In re:	:	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY
	:	
Helen Tomaskovic	:	Honorable Vincent F. Papalia
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Debtor,	:	Case No: 18-14652

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**OBJECTION TO TRUSTEE CERTIFICATION OF DEFAULT**

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I, Leonard R. Boyer, Esq., of Boyer Coffy, LLC., hereby certifies as follows:

On or about May 2, 2019, Jackie Michaels, of Marie-Ann Greenberg, Chapter 13 Standing Trustee, filed a Certification of Default for failure to file a loan modification.

Debtor did apply for a loan modification, however, she was denied for insufficient income, for the second time.

Debtor's children are willing to help her, debtor's daughter who lives in the home is taking the money from her 401K to pay off the arrears on debtor's home.

Our office is sending a letter to attorneys for mortgage company Bonial & Associates, P.C., requesting a payoff on the arrears, proof of claim filed 3/28/18 shows a pre-petition arrears of \$56,510.25. Debtor's daughter is ready and willing to take the funds from her 401k to this amount off.

Debtor's daughter is very close to and concerned about her mother and the trauma that losing her home would cause her mother.

Debtor's children have contributed to the mortgage payments, which client has made on time since the original petition was filed on 3/8/2018.

Debtor has lived in this home for over 40 yrs, she was unaware of the amount owed on the property until her husband passed away, she was under the impression that the property was paid in full.

Debtor's children are concerned that losing her home could result in debtor suffering from insomnia and depression.

Debtor is over 80 yrs old, has retired, however, went back to work to be able to make payments on the property, as well trustee payment for arrears.

Debtor prays that she be allowed the opportunity to continue in her lifetime family home.

/s/ Leonard R. Boyer, Esq.  
LEONARD R. BOYER, ESQ.

Dated: May 13, 2019